

Remarks

Applicants appreciate the courtesies extended by the Examiner during the telephonic interview of June 28, 2006. While no agreement was reached during that interview, applicants believe, in light of the interview and the remarks set forth below, each pending claim recites novel limitations not taught or suggested in the prior art of record, and therefore should be allowed. Particularly, applicants believe that the discussion of the limitations of a “domain” and “masking” set forth below will help to clarify certain distinctions between the prior art of record and the pending claims and thus render the rejections of based on § 103 moot.

Remarks Addressed to Limitations Containing the Word “Domain”

Remarks Addressed to the Meaning of the Word “Domain”

Having reviewed the portions of the prosecution history which were highlighted by the Examiner, applicants believe that the failure to reach an agreement with the Examiner is largely the result of unclear communication on the part of applicants’ prior counsel. For example, applicants believe that setting forth three definitions of a domain in the remarks filed October 14, 2004, may have unnecessarily obscured the arguments applicant attempted to make regarding domains. While applicants do not wish to be understood as suggesting that the definitions for a domain set forth previously were inconsistent or inaccurate, applicants believe that using definitions, which highlighted different aspects of a “domain”, was both unnecessary and unhelpful.

In order to minimize the possibility of miscommunication, applicants will limit the remarks regarding a “domain” in this paper to those which can be made using the definition provided by *Webster’s New World Computer Dictionary*, 9th ed. (*Webster’s*): “A group of computers that are administered as a unit.” Applicants believe that this definition is likely to be

particularly helpful in minimizing the possibility for miscommunication because *Webster's* provides a specific example of the use of a domain in the context of the internet:

On the Internet, this term refers to all the computers that are collectively addressable within one of the four parts of an IP address. For example, the first part of an IP address specifies the number of a computer network... All the computers within this network are part of the same domain.

While applicants note that that definition was cited in remarks filed in October, November, and December of 2004, applicants believe that the remarks presented in this paper will more clearly address the prior art cited by the Examiner because the present paper avoids the additional definitions for a “domain” which have proven unhelpful in the past.

Remarks Addressed to the Novelty of Limitations Including the Term Domain

The clear definition of a “domain” set forth above will be helpful for applicants in responding to the office action mailed March 17, 2006 (“Present Office Action”). Regarding domains, the Present Office Action stated that

Brandt teaches a method for providing help/support information to user including the steps of: passing a navigation event (the help signal paragraph 29) from a first frame (web page) originating from a first domain (the web file) to a second frame (the help window, paragraph 13) originating from a second domain (the instructions in the computer memory), see paragraphs 36 and 37.
Present Office Action at 3.

The Present Office Action also states that Brandt does not specifically teach that “the user’s computer, first Internet domain, and second Internet domain are separate” (Present Office Action at 3) but asserts that “[s]eparation of each of the various features of Jawahar is taught in at least Figure 2” (Present Office Action at 4). However, applicants assert that neither Brandt, nor Jawahar, nor the combination of the two teaches or suggests a first domain and a second domain separate from an end user computer.

While applicants acknowledge that, as stated on page 6 of the office action mailed March 14, 2005 (“March ’05 Office Action”), a user’s computer is inherently assigned an IP address

within the domain of the user's ISP, applicants assert that Brandt does not implicitly teach information originating from multiple domains by disclosing both a server and a user computer. Particularly applicants respectfully disagree with the assertion on page 6 of the March '05 Office Action that "any information retrieved through the user's computer is implicitly 'originating from a second domain'" because applicants assert that retrieving and originating are distinct concepts. Retrieving means obtaining something *from* some other source or entity. Originating means providing something *to* some other source or entity. Retrieving information, from a network, through an end user computer, does not teach or imply that the end user computer also originates the information. Indeed, there is no logical reason why an end user computer would use a network to retrieve information, that it originated, from itself.

Additionally, applicants note that, even if retrieving and originating information were not distinct concepts, Brandt's teaching of an end user computer retrieving information from a server, at paragraph 36, would still not teach or suggest information originating from multiple domains because ***all information actually provided to an end user is necessarily retrieved through the end user's computer***. Therefore, if information retrieved through the end user's computer is considered to be "originating from the second domain" then all information, presented to the user, originates from the second domain in Brandt and Brandt still does not teach or suggest information originating from multiple domains as is recited in the pending claims.

Applicants respectfully traverse the assertion, set forth on page 3 of the Present Office Action, that the web file and instructions in computer memory respectively teach or suggest a first and a second domain. Regarding paragraph 36 of Brandt, one of the sections cited in the Present Office Action regarding the web file and instructions in computer memory, applicants note that this paragraph states "when an initial web page is provided as a file sent by the server computer to the browser, a set of instructions is included in the file. The set of instructions is executable by the computer and is for displaying graphics that comprise the help window." Applicants submit that that statement indicates that the disclosure regarding a web file and instructions in computer memory in paragraph 36 of Brandt cannot be treated as teaching or suggesting content originating from multiple domains because paragraph 36 of Brandt

specifically states that the instructions are included in the web file itself. Regarding paragraph 37 of Brandt, the other section cited regarding the web file and instructions in computer memory, applicants acknowledge that, as pointed out in the advisory action mailed November 11, 2004 (“November ’04 Advisory Action”), Brandt does teach that the help information may come from sources other than the web server. However, applicants respectfully assert that paragraph 37 of Brandt does not teach or suggest content originating from multiple domains. In support of that assertion, applicants note that the discussion of the help information in paragraph 37 of Brandt reads as follows:

the help window information file 33 could be provided from another source than the file 33. For example, it could be provided as part of the file 31. Alternatively, all of the possible help files for a particular web site could be stored in or at the computer 12, by being down loaded from the server 33, or from another node.

Applicants submit that, as was set forth on page 8 of the office action response filed in November 2004 (“November ’04 Response”), disclosing that an information file might be provided as part of the file 31 does not teach content originating from multiple domains because figure 1 of Brandt clearly shows that file 31 is stored on the same server as file 33, and therefore is not a separate domain. Further, while applicants reiterate the arguments set forth on page 9 of the November ’04 Response that storing help files on the computer 12 does not amount to a different domain, applicants believe that this argument should be contextualized in light of the previously focused definition of the term domain. Specifically, applicants note that a domain is defined above as “[a] group of computers that are administered as a unit” and that Brandt states that help files could be downloaded from the server or from another node. Using the definition of a domain, applicants submit that Brandt teaches nothing more than that the help file could be downloaded from a computer (node) in the same group of computers (domain) as the server. Therefore, applicants assert that the web file and instructions in computer memory discussed in paragraphs 36 and 37 of Brandt do not teach or suggest content originating from multiple domains.

Applicants respectfully assert that Figure 2 of Jawahar does not teach that “the user’s computer, first Internet domain, and second Internet domain are separate,” a teaching which is

concededly absent from Brandt. The Final Office Action mailed July 8, 2005 states that the applicants acquiesced to the argument that Jawahar supplies the teachings missing from Brandt by failing to traverse it. Applicant's traverse this assumption and wish to clarify for the record that they most certainly do not concede this point. Reconstructing the prosecution record, it appears that prior counsel, rather than conceding this point, was merely trying to tailor that response to the points raised in the March '05 Office Action. Applicants now present their argument as to why Jawahar does not teach that the user's computer, first Internet domain, and second Internet domain are separate.

In support of that assertion, applicants note that Jawahar teaches that "Agent application 70 interacts with other devices shown in FIG. 2...In this example, agent application 70 is a client of database management server 60, which retrieves the appropriate information about the transaction initiator from a database 58" (col. 5, ll. 56-66).

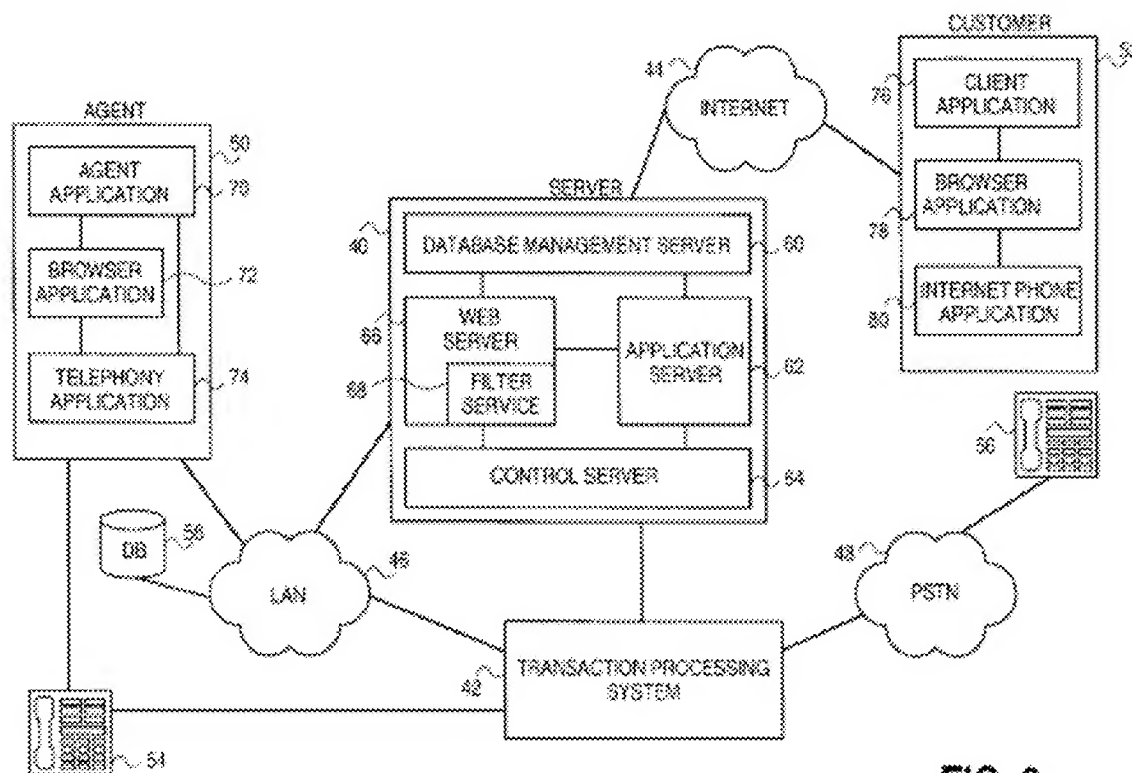


FIG. 2

As can be seen above, figure 2 of Jawahar depicts the database management server 60, as well as the web server 66, as being included within server 40. *See* Figure 2; col. 7, ll. 24-25. Because of that, and because Jawahar teaches that agent application 70 is a client of database management

server 60, applicants assert that Figure 2 of Jawahar teaches the *integration* of those features, not their separation as asserted on page 4 of the Present Office Action. Further, even if Figure 2 of Jawahar did teach separation of features, the combination of Brandt and Figure 2 of Jawahar would still not teach or suggest that the user's computer, first Internet domain, and second internet domain are separate because neither Brandt nor Figure 2 of Jawahar teaches or suggests multiple domains which could potentially be separated. The features which are at issue in Jawahar are not domains but computers (server 40 and agent computer system 50). Computers are different from domains because a domain is a group of computers administered as a unit, rather than a particular computer (such as server 40 or agent computer system 50). Brandt does not teach or suggest multiple domains for the reasons set forth above. Figure 2 of Jawahar does not teach or suggest multiple domains because, as set forth above, Figure 2 of Jawahar teaches integration rather than separation of features, and therefore does not teach multiple domains.

The arguments set forth above can be used to distinguish each pending claim from the prior art of record. Claim 37 recites "a first frame originating from a first domain to a second frame originating from a second domain, wherein the first domain and the second domain are separate from the end-user computer." Claim 45 recites "a first frame of a Web page originating from a first Internet domain to a second frame of the Web page originating from a second Internet domain, wherein the first Internet domain and the second Internet domain are distinct from the end-user computer." Claim 53 recites "a first frame originating from a first Internet domain to a second frame originating from a second Internet domain... wherein the end-user's computer, the first Internet domain, and the second Internet domain are separate domains." All of the remaining claims depend from one of claims 37, 45 or 53. Based on the arguments set forth previously, applicants assert that the limitations quoted in this paragraph are neither taught nor suggested in the prior art of record. Therefore, applicants respectfully request that all rejections based on the combination of Brandt and Jawahar be withdrawn, and that all pending claims be allowed.

Remarks Regarding the Recitation of Masking in the Pending Claims

Applicants submit that the limitations of, “where the first domain is associated with a first address,” and the second domain is associated with a second address, masking one or both of the first or second addresses to create the appearance that the first and second addresses are the same address, as recited in claim 55, provides an additional point of novelty which can be used to distinguish that claim from the prior art of record. Applicants assert that the section of the prior art cited by the Examiner as teaching those limitations, lines 31-44 of column 7 of US 6,694,314 (“Sullivan”), does not teach or suggest the limitations of claim 55. In support of that assertion, applicants note that lines 31-44 of column 7 of Sullivan teach maintaining security throughout a single logical session comprised of multiple TCP sessions. By contrast, applicants note that the address masking of claim 55 is designed to *circumvent* the consistent page domain security requirement, not to maintain security, as taught in Sullivan. This contrast can be brought into sharp relief by comparing paragraph 38 of the specification as originally filed, which states that “to circumvent the consistent page domain security requirement, the annotation server 200 masks the content from the content provider 115 so that it appears to originate from the same domain as the automated agent (step 275)” with lines 39-40 of column 7 of Sullivan, which states that “a given data set is preferably sealed to restrict access to the data to those having proper credentials.” Therefore, applicants assert that the prior art of record does not teach the novel limitations of claim 55, and respectfully request that the rejection of claim 55 be withdrawn, and that that claim be allowed.

General Remarks

Applicants submit that the above discussion does not constitute an exhaustive list of the novel limitations found in claims 37-56 which are not taught or suggested in the prior art of record. To the extent that applicants have not addressed certain aspects of the present rejection, please do not construe the same as an admission as to the merits of the rejections. Indeed, applicants reserve all rights with respect to arguments not explicitly raised herein.

CONCLUSION

In light of the arguments made herein, it is respectfully submitted that the claims of the present application meet the requirements of patentability under 35 U.S.C. § 103. Accordingly, reconsideration and allowance of these claims are earnestly solicited. Applicants encourage the Examiner to contact their representative, Ria Schalnatz at (513) 651-6167 or rschalnat@fbtlaw.com, if questions persist or if additional matters need to be dealt with prior to allowance.

The Commissioner for Patents is hereby authorized to charge any deficiency or credit any overpayment of fees to Frost Brown Todd LLC Deposit Account No. 06-2226.

Respectfully submitted,
Daniel K. Burgin, et al.

By //Ria Farrell Schalnatz//
Ria Farrell Schalnatz
U.S. Patent & Trademark Office Registration No. 47,058
Attorney for Applicants
FROST BROWN TODD LLC
2200 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6167